

The Hon. Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CECILIA WILSON, as guardian for R.W., a minor; KEVIN and CECILIA WILSON, individually and as husband and wife; CANDACE DAWSON, as guardian for J.D.; CANDACE DAWSON, individually; CANDI LANDIS as guardian for A.L., a minor, BRANDON BASTIN, as guardian for J.M.B., a minor, TESSA GREEN, as guardian for W.L., a minor;

Plaintiffs.

V.

LONGVIEW SCHOOL DISTRICT, a municipal corporation;; JERRY STEIN, in his individual and official capacity; PATRICK KELLEY, in his individual and official capacity; SUZANNE CUSICK, in her individual and official capacity;

Defendants.

| NO. 3:15-cv-05863-RJB

**NOTICE OF APPEAL AND
REPRESENTATIVE STATEMENT**

NOTICE is hereby given that Plaintiffs appeal to the United States Court of Appeals for the Ninth Circuit from:

1. Giving of certain jury instructions and failure to give certain jury instructions (Docket #137 and Docket #145);
 2. Exclusion of testimony of JB and PK (Docket #93 and Docket #105);
 3. Order on *Motions in Limine* excluding evidence of prior bad acts of Jerry Stein, suppression of testimony of Dr. Anna Salter, and suppression of testimony of JB (Docket #78);
 4. Dismissal of outrage, negligence and Section 1983 claims against Longview School District and all claims against Patrick Kelley and Suzanne Cusick (Docket #122);
 5. Failure to order Defendants to produce the entirety of Defendants' internal investigative file (Docket #122); and
 6. Amended Judgment (Docket #147).

REPRESENTATION STATEMENT

Pursuant to Ninth Circuit Rule 3-2(b), Plaintiffs identify the following parties to this action, and their counsel of record:

1. Appellants: CECILIA WILSON, as guardian for R.W., a minor;
KEVIN and CECILIA WILSON, individually and as husband and wife;
CANDACE DAWSON, as guardian for J.D.;
CANDACE DAWSON, individually;
CANDI LANDIS as guardian for A.L., a minor,
BRANDON BASTIN, as guardian for J.M.B., a minor, and
TESSA GREEN, as guardian for W.L., a minor.

Tara Lawrence
Lawrence Law Office, P.C.
6960 SW Varns Street
Portland, OR 97223
Phone: (503) 387-5571
Fax: (888) 660-7336
tara@taralawrencelaw.com

1 Roger S. Davidheiser
2 Friedman | Rubin PLLP
3 51 University Street, #201
4 Seattle, WA 98101
5 Phone: (206) 501-4446
6 Fax: (206) 623-0794
7 rdavidheiser@friedmanrubin.com

8 Kenneth Friedman
9 Friedman | Rubin PLLP
10 1126 Highland Avenue
11 Bremerton, WA 98337
12 Phone: (360) 782-4300
13 Fax: (360) 782-4358
14 kfriedman@friedmanrubin.com

- 15 2. Appellees: LONGVIEW SCHOOL DISTRICT, a municipal corporation;
16 JERRY STEIN, in his individual and official capacity;
17 PATRICK KELLEY, in his individual and official capacity; and
18 SUZANNE CUSICK, in her individual and official capacity.

19 Francis S. Floyd
20 John A. Safarli
21 FLOYD FLUEGER & RINGER, P.S.
22 200 W. Thomas Street, Suite 500
23 Seattle, WA 98119-4296
24 Tel (206) 441-4455
25 Fax (206) 441-8484
26 ffloyd@floyd-ringer.com
27 jsafarli@floyd-ringer.com

1
2
3
4 Dated this 17th day of January, 2018.
5
6
7

LAWRENCE LAW OFFICE, P.C.

8 By /s/ Tara Lawrence
9 Tara Lawrence, Oregon State Bar # 990581
10 tara@taralawrencelaw.com
11 6960 SW Varns Street
12 Portland, OR 97223
13 Phone: (503) 387-5571
14 Fax: (888) 660-7336
15 (PRO HAC VICE)

FRIEDMAN | RUBIN

16 By: /s/ Roger S. Davidheiser
17 Roger S. Davidheiser, WSBA# 18638
18 rdavidheiser@friedmanrubin.com
19 51 University Street, #201
20 Seattle, WA 98101
21 Phone: (206) 501-4446
22 Fax: (206) 623-0794

23 By: /s/ Kenneth Friedman
24 Kenneth R. Friedman, WSBA# 17148
25 kfriedman@friedmanrubin.com
26 1126 Highland Avenue
27 Bremerton, WA 98337
28 Phone: (360) 782-4300
Fax: (360) 782-4358

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

s/ Roger Davidheiser via ECF